

EXHIBIT “1”

SUMMARY OF ATTORNEYS' FEES + COSTS

TOTAL ATTORNEY'S FEES		\$24,471.25
(See attached breakdown)	+	

TOTAL COSTS		\$350.00
(See attached breakdown and receipt)		

TOTAL ATTORNEY'S FEES + COSTS:		<hr/> \$24,821.25
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Attorney's Fees: Wilfredo Rosado v. City of New York et al. 11 CV 4285 (SAS)(GWG)

Date	Activity	Hours	Rate	Total	Hours	Rate	Adjusted Total
02-15-2011	Initial meeting with client, reviewed files provided by client	3.0	400	1,200	3.0	350	1,050
02-15-2011	Telephone communication with other counsel re: merits of case, claims, value of case to discuss the case and potential value of case, liability.	0.30	400	120	0.15	350	52.50
03-14-2011	Draft Complaint, Summons, and Civil Cover Sheet	5.0	400	2,000	4.0	350	1,400
03-14-2011	Telephone communication with client's family re: case	0.15	400	60	0.15	350	52.50
06-24-2011	Filed Summons and Complaint in SDNY	1.0	400	400	1.0	125	125
06-24-2011	Service of Summons and Complaint on City of New York	0.45	400	180	0.45	125	56.25
06-26-2011	ECF & Drafting/Filing Affidavit of Service/ Summons and Comp.	1.0	400	400	1.0	125	125
07-08-2011	Telephone communication ACC Re: whether plaintiff had the first name of shield number for defendant CO Valez.	0.15	400	60	0.15	350	52.50
07-08-2011	Review file for badge number or first name of defendant Valez.	0.30	400	120	0.30	350	105
07-08-2011	Communication with other counsel re: identifying first names and badge numbers of DOC employees	0.15	400	60	0.075	350	26.25
07-08-2011	Communication with ACC regarding whether plaintiff was able to locate badge and first name.	0.15	400	60	0.15	350	52.50

07-11-2011	Communication with other counsel re: advise on locating CO correction officers	0.30	400	120	0.15	350	52.50
07-14-2011	Communication with client. Re: Discussion of 2 page correspondence from client regarding case status and contact info.	0.30	400	120	0.30	350	105
07-15-2011	Communication with client. Re: Drafted Letter responding to client's inquiries	1.0	400	400	1.0	350	350
07-15-2011	Reviewed and analyzed Answer to Complaint filed by City of New York and the affirmative defenses asserted	1.0	400	400	1.0	350	350
07-27-2011	Correspondence with Case Openings at SDNY	0.15	400	60	0.15	350	52.50
07-27-2011	Reviewed Order for Initial Pretrial Conference	0.30	400	120	0.30	350	105
07-28-2011	Correspondence via e-mail and telephone with ACC Re: City claimed that it required plaintiff's NYSID number because there was no record that he was in DOC custody at the time of the incident.	0.15	400	60	0.15	350	52.50
07-28-2011	Reviewed file to ensure that Client was in DOC custody on the date of the alleged incident. Located DOC document that indicated he was in DOC's custody at the time of the incident and forwarded it to ACC. Sent NYSID and Book & Case to ACC.	0.45	400	180	0.45	350	157.50
07-29-2011	Communication with ACC re: NYSID and Book & Case of client.	0.15	400	60	0.15	350	52.50
08-14-2011	Communication with ACC re: Proposed	0.15	400	60	0.15	350	52.50

	Scheduling Order						
08-15-2011	Reviewed proposed scheduling order	0.30	400	120	0.30	350	105
08-15-2011	Communication with ACC re: Scheduling order	0.15	400	60	0.15	350	52.50
08-17-2011	Communication with other counsel re: judge Scheindlin's Rules and scheduling order	0.45	400	180	0.225	350	78.75
08-17-2011	Communication with ACC re: Service addresses, finalizing scheduling order	0.15	400	60	0.15	350	52.50
08-17-2011	Drafting/editing Proposed scheduling order	0.30	400	120	0.30	350	105
08-17-2011	Drafted Initial Disclosures and Discovery demands	2.0	400	800	1.0	350	350
08-18-2011	Prepare for Initial Conference	1.0	400	400	1.0	350	350
08-19-2011	Initial Conference	1.0	400	400	1.0	350	350
08-19-2011	Reviewed Order of Reference to a Magistrate Judge	0.15	400	60	0.15	350	52.50
08-19-2011	Reviewed Scheduling Order and add to calendar	0.30	400	120	0.30	350	105
08-29-2011	Reviewed Order Scheduling Settlement Conference	0.30	400	120	0.30	350	105
08-24-2011	Communication with ACC re: clearer copies of discovery	0.45	400	180	0.45	350	157.50
08-29-2011	Communication with other counsel re: case strategy and settlement demand	0.15	400	60	0.075	350	26.25
08-29-2011	Communication with client about a settlement demand and the status of the case.	1.0	400	400	1.0	350	350
09-06-2011	Draft Letter to ACC regarding illegible documents produced during discovery by	1.0	400	400	1.0	350	350

	defendants						
09-06-2011	Discussion with client Rosado re: settlement conference	0.30	400	120	0.30	350	105
09-06-2011	Reviewed Correspondence from ACC to Court Re: settlement conference	0.20	400	80	0.20	350	70
09-06-2011	Reviewed Court's Order adjourning settlement conference	0.15	400	60	0.15	350	52.50
09-06-2011	Drafted Amended Complaint and supporting documents	1.0	400	400	1.0	350	350
09-06-2011	Correspondence with ACC via e-mail regarding getting better copies of illegible documents and settlement	0.15	400	60	0.15	350	52.50
09-06-2011	Communication with other counsel re: ACC's positions and plaintiff's options	0.30	400	120	0.15	350	52.50
09-07-2011	Filed Amended Complaint	1.0	400	400	1.0	125	125
09-12-2011	Phone conf. w/ACC	0.15	400	60	0.15	350	52.50
09-12-2011	Communication with other counsel re: phone conf. case strategy	0.15	400	60	0.075	350	26.25
09-14-2011	Communication with other counsel re: case strategy	0.15	400	60	0.075	350	26.25
09-15-2011	Communication with other counsel re: case strategy	1.0	400	400	0.5	350	175
09-18-2011	Drafted responses to Defendants' Discovery demands	4.0	400	1,600	3.0	350	1,050
09-19-2011	Client meeting re: prepare for settlement conference, settlement letter to Court and releases requested by defendants as part of discovery	3.0	400	1,200	3.0	350	1,050

09-19-2011	Communication with other counsel re: case strategy	0.15	400	60	0.075	350	26.25
09-19-2011	Reviewed discovery produced by City	4.0	400	1,600	3.0	350	1,050
09-19-2011	Communication with ACC re: plaintiffs discovery requests and responses to defendants discovery requests	1.0	400	400	1.0	350	350
09-20-2011	Drafted Pre-Settlement letter to the Court	6.0	400	2,400	5.0	350	1,750
09-20-2011	Reviewed photograph of client	0.15	400	60	0.15	350	52.50
09-21-2011	Communication with other counsel re: case strategy	1.0	400	400	0.5	350	175
09-22-2011	Reviewed defendants Answer to the Amended Complaint	0.30	400	120	0.30	350	105
09-22-2011	Communication with other counsel re: case strategy	0.15	400	60	0.15	350	52.50
09-26-2011	Reviewed additional discovery produced by the ACC which implicates many issues that will be raised at the settlement conference	1.20	400	480	1.20	350	420
09-26-2011	Reviewed and analyzed defendant's memo re: settlement conference	0.30	400	120	0.30	350	105
09-27-2011	Communication with other counsel re: review of discovery	0.45	400	180	0.225	350	78.75
09-27-2011	Preparation for Settlement Conference re: review document and prepare arguments	3.0	400	1,200	3.0	350	1,050
09-27-2011	Correspondence with ACC re: unreadable discovery documents	1.0	400	400	1.0	350	350
09-28-2011	Client meeting re: settlement conference	1.3	400	520	1.3	350	455
09-28-2011	Settlement Conference	2.0	400	800	2.0	350	700

09-29-2011	Reviewed and analyzed proposed Confidentiality Stipulation	0.30	400	120	0.30	350	105
09-29-2011	Telephone conf with ACC re: defendant's responses to discovery requests	0.15	400	60	0.15	350	52.50
09-29-2011	Review Defendant's responses to plaintiff's discovery requests and additional documentation	1.0	400	400	1.0	350	350
10-03-2011	Telephone conversation with ACC. Re: settlement	0.15	400	60	0.15	350	52.50
10-12-2011	Deficiency letter to defendants	8.0	400	3,200	8.0	350	2,800
10-12-2011	Communication with other counsel re: deficiency letter	0.15	400	60	0.075	350	26.25
10-13-2011	Edited and sent deficiency letter	0.45	400	180	0.45	350	157.50
10-17-2011	Researched electronic discovery issues as related to defendants' discovery responses containing emails.	5.0	400	2,000	4.0	350	1,400
10-18-2011	Communication with ACC via e-mail regarding settlement	0.15	400	60	0.15	350	52.50
10-18-2011	Communication with other counsel re: case strategy	1.0	400	400	0.5	350	175
10-19-2011	Drafted and sent Second Set of Request For Production of Documents to Defendants with accompanying letter	2.0	400	800	2.0	350	700
10-20-2011	Communication with other counsel re: case strategy	0.15	400	60	0.075	350	26.25
10-20-2011	Communication with client via telephone re: Status of case.	0.30	400	120	0.30	350	105
10-21-2011	Phone conference with ACC re: discovery/ deficiency letter	0.15	400	60	0.15	350	105

10-21-2011	Correspondence with ACC re: extension of time for defendant to respond to deficiency letter	0.30	400	120	0.30	350	105
10-21-2011	Communication with other counsel re: case strategy	1.0	400	400	0.5	350	175
10-22-2011	Prepared Summons and Complaint for Process Server	0.30	400	120	0.30	350	105
10-22-2011	Communication with other counsel re: case strategy	0.30	400	120	0.15	350	52.50
10-25-2011	Drafted Letter to Process Server	0.15	400	60	0.15	350	52.50
10-25-2011	Delivered file to Process Server	0.45	400	180	0.45	125	56.25
10-26-2011	Communication with ACC re: deficiency letter	1.0	400	400	1.0	350	350
10-26-2011	Communication with other counsel re: case strategy	1.0	400	400	0.5	350	175
10-26-2011	Reviewed Defendants' request for discovery	0.45	400	180	0.45	350	157.50
10-26-2011	Review Defendant's Response to plaintiff's Deficiency Letter	0.45	400	180	0.45	350	157.50
10-27-2011	Reviewed Rule 68	0.15	400	60	0.15	350	52.50
TOTALS		82.35		\$32,940	72.28		\$24,471.25

COSTS: Wilfredo Rosado v. City of New York et al. 11 CV 4285 (SAS)(GWG)

Cost Description	Cost
Filing Fee - SDNY	\$350.00
Total Costs	\$350.00

COURTS/USDC-NY-3
500 Pearl St
New York, NY 10007

TERMINAL I.D.: 13400002

MERCHANT #: 00000000787366

AMEX

SALE

BATCH: 001883 INVOICE: 000002
DATE: JUN 24, 11 TIME: 09:51
RRN: 0000461147 AUTH NO: 581893

*****1006

TOTAL \$350.00

ILISSA BROWNSTEIN

CUSTOMER COPY

Court Name: District Court
Division: 1
Receipt Number: 465401010017
Cashier ID: Mnadeau
Transaction Date: 06/24/2011
Payer Name: ILISSA BROWNSTEIN

CIVIL FILING FEE
For: ILISSA BROWNSTEIN
Case/Party: D-NYS-1-11-CV-004285-001
Amount: \$350.00

CREDIT CARD
Amt Tendered: \$350.00

Total Due: \$350.00
Total Tendered: \$350.00
Change Amt: \$0.00

SAS